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26 1/30/20

4 Attorney for Defendant
Adam L. Polson

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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

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9 CHAMPERY RENTAL REO, LLC, a
10 California Limited Liability Company,
Plaintiff,

Civil No. 3:19-cv-00529-MMD-CBC

11 vs.

12 ADAM L. POLSON; et. al.
Defendant.

SECOND STIPULATION TO STAY
PROCEEDINGS IN ORDER TO ALLOW
SETTLEMENT DISCUSSIONS TO PROCEED

13 AND ALL RELATED ACTIONS
14 /

15 COME NOW Defendant, Adam Polson, by and through his attorney, Michael Lehnerns,
16 Esq; Third Party Defendant, Renovista Ridge Master Property Owners Association ("Reno
17 Vista"), by and through its attorney, Sophie Karadanis, Esq. of Leach, Kern, Gruchow,
18 Anderson, Song, and Plaintiff Champerry Rental REO, LLC, by and through its attorney,
19 Matthew K. Schriever, Esq. of Hutchinson & Steffen, PLLC; Defendant United States (Internal
20 Revenue Service) by and through its attorney Boris Kukso, Esq. and stipulate as follows:

21 1. On April 27, 2020 Reno Vista filed a motion to dismiss Mr. Polson's third party
22 complaint (ECF 45). On May 6, 2020 Mr. Polson filed his response (ECF 48). On May 13,
23 2020 Reno Vista filed its reply (ECF 49). The motion has not yet been ruled upon.

24 2. On May 21, 2020 Plaintiff filed a motion for summary judgment against Mr.
25 Polson (ECF 51). Mr. Polson's response is due on June 11, 2020.

26 3. On May 22, 2020 the United States filed a motion for summary judgment against
27 the Plaintiff (ECF 52). The Plaintiff's response is due June 12, 2020.
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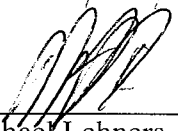
4. On June 2, 2020 this Court approved a stipulation between the Plaintiff and Reno Vista to extend the time to conduct depositions to August 31, 2020 (ECF 54).

5. On June 8, 2020, the parties entered into a stipulation and order that stayed matters until July 31, 2020 for the purposes of furthering settlement discussions (ECF 57 & 58).

6. The parties have reached a tentative settlement agreement. Counsel for Defendant Polson has agreed to draft the term sheet and the agreement.

7. The parties hereby request that this matter be stayed through September 30, 2020 in order to see if the parties can reach a global settlement. Should the matter not settle, then the parties would request that the deadlines to file responses to the pending summary judgment motions be extended to October 15, 2020.

Dated: 7/30/20


Michael Lehnert, Esq.
Attorney for Adam Polson

Dated: 7/30/20

/s/ Sophie Karadanis
Sophie Karadanis, Esq.
Attorney for Reno Vista

Dated: 7/30/20

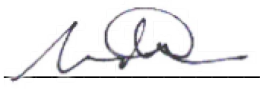
/s/ Boris Kukso
Boris Kukso, Esq.
Attorney for United States

Dated: 7/30/20

/s/ Matthew Schriever
Matthew K. Schriever, Esq.
Attorney for Champerty Rental REO

Dated: 7/30/2020

IT IS SO ORDERED.


Miranda M. Du,
Chief U. S. District Judge